

AIR QUALITY CLASS I OPERATING PERMIT

PERMIT NUMBER: OP18R1-030

NDEE ID: 000125

Program ID: AIR 001 00011

Permit Issued To: Dutton-Lainson Company

Name of Source in Application: Dutton-Lainson Company

Mailing Address: P.O. Box 729, Hastings, NE 68902-729

Source Location: 1601 W. 2nd St., Hastings, Adams County, Nebraska

Project Description: This operating permit approves the operation of a fabricated metal product manufacturing facility.

Standard Industrial Classification (SIC) Code(s): 3499, 3469, 3451

North American Industry Classification System (NAICS) Code: 332999

Superseded Operating Permit(s): Operating permit OP12R1-015 issued February 28, 2015.

Pursuant to Title 129, Chapter 14, of the Nebraska Air Quality Regulations, the public has been notified by prominent advertisement of the proposed operation of an air contaminant source and the thirty (30) day period allowed for comments has elapsed. This Operating Permit approves the operation of a fabricated metal product manufacturing facility. This Operating Permit approves the operation of this source as identified in the Air Quality Operating Permit Application OP18R1-030 received September 17, 2018, including any supporting information received prior to issuance of this permit. Additional details on the source, including estimated pollutant emissions, can be found in the accompanying Fact Sheet.

Compliance with this permit shall not be a defense to any enforcement action for violation of an ambient air quality standard. Unless otherwise noted the conditions of this permit are enforceable by the United States Environmental Protection Agency (USEPA) and the Nebraska Department of Environment and Energy (NDEE). The permit holder, owner, and operator of the source shall assure compliance with all of the terms and conditions in this permit and the Attachments.

The undersigned issues this document on behalf of the NDEE Director in accordance with Title 129 – Nebraska Air Quality Regulations.

DRAFT

Date

Kevin Stoner, Administrator
Air Quality Division

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ABBREVIATIONS, SYMBOLS, and UNITS OF MEASURE

AP-42	Compilation of Air Pollutant Emission Factors, Volume I, Stationary Point and Area Sources	NDEE	Nebraska Department of Environment and Energy
BACT	Best Available Control Technology	NESHAP	National Emission Standards for Hazardous Air Pollutants
Btu	British Thermal Unit	NO ₂	Nitrogen Dioxide
bu	Bushel	NO _x	Nitrogen Oxides
CAA	Clean Air Act	N ₂ O	Nitrous Oxide
CE	Control Equipment	NSPS	New Source Performance Standard
cf	Cubic Feet	NSR	New Source Review
CFC	Chlorofluorocarbons	OP	Operating Permit
CEMS	Continuous Emissions Monitoring System	PAL	Plant-wide Applicability Limit
CFR	Code of Federal Regulations	Pb	Lead
CO	Carbon Monoxide	PEMS	Predictive Emissions Monitoring System
CO ₂	Carbon Dioxide	PM	Particulate Matter
CO _{2e}	Carbon Dioxide Equivalent	PM _{2.5}	Particulate Matter with an aerodynamic diameter equal to or less than 2.5 microns
CP	Construction Permit	PM ₁₀	Particulate Matter with an aerodynamic diameter equal to or less than 10 microns
Director	Director of the Nebraska Department of Environment and Energy	PM ₁₀ (total)	Filterable and condensable particulate matter
dscf	Dry Standard Cubic Feet	ppb	Parts per Billion
dscfm	Dry Standard Cubic Feet per Minute	ppm	Parts per Million
EMIS	Emergency Management Information System	ppmv	Parts per Million by Volume
EQC	Environmental Quality Council	ppmvd	Parts per Million by Volume, dry basis
EP	Emission Point	PSD	Prevention of Significant Deterioration
EU	Emission Unit	PTE	Potential to Emit
FIP	Federal Implementation Plan	scf	Standard Cubic Feet
FR	Federal Register	SIC	Standard Industrial Classification
ft	Feet	SIP	State Implementation Plan
FTIR	Fourier Transform Infrared	SO ₂	Sulfur Dioxide
GHGs	Greenhouse Gases	SO _x	Sulfur Oxides
HAP	Hazardous Air Pollutant(s)	Title 129	Title 129, Nebraska Air Quality Regulations
hp	Horsepower	TDS	Total Dissolved Solids
hr	Hour	tpy	Tons per year
lb	Pound	TRS	Total Reduced Sulfur
LDAR	Leak Detection and Repair	TSP	Total Suspended Particulate Matter
LNB	Low NO _x Burner	USEPA	United States Environmental Protection Agency
MACT	Maximum Achievable Control Technology	UTM	Universal Transverse Mercator
Mgal	One Thousand Gallons	VHAP	Volatile Hazardous Air Pollutant
MMBtu	One Million British Thermal Units	VMT	Vehicle Miles Traveled
MMgal	One Million Gallons	VOC	Volatile Organic Compound
MMscf	One Million Standard Cubic Feet	yr	Year
MSDS	Material Safety Data Sheet		
n/a	Not Applicable		
NAAQS	National Ambient Air Quality Standards		

I. STANDARD CONDITIONS

The following Standard Conditions apply to this permit unless otherwise provided for in the Specific Conditions of this permit.

(A) Regulatory authority:

- (1) Title 40 Protection of Environment, Code of Federal Regulations that apply to the source including those not currently delegated to Nebraska or not yet included in Title 129; and
- (2) Title 129 as amended June 24, 2019.

(B) The source shall allow the NDEE, USEPA or an authorized representative, upon presentation of credentials (Neb. Rev. Statute §81-1504; Title 129, Chapter 8, Section 012.02) to:

- (1) Enter upon the source's premises during reasonable hours where a source subject to this permit is located, emissions-related activity is conducted, or where records must be kept under the conditions of this permit, for the purpose of ensuring compliance with this permit or applicable requirements;
- (2) Have access to and copy, during reasonable hours, any records that must be kept under the conditions of this permit, for the purpose of ensuring compliance with this permit or applicable requirements;
- (3) Inspect during reasonable hours any facilities, pollution control equipment, including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit, for the purpose of ensuring compliance with this permit or applicable requirements;
- (4) Sample or monitor, during reasonable hours, substances or parameters for the purpose of ensuring compliance with the permit or applicable requirements.

(C) All requested permit amendments and revisions must adhere to the requirements of Title 129, Chapter 15.

(D) This permit may be revoked for cause, including but not limited to (Title 129, Chapter 15, Section 006):

- (1) The existence at the source of unresolved noncompliance with applicable requirements or a term or condition of this permit, and refusal of the source to agree to an enforceable schedule of compliance to resolve the noncompliance;
- (2) The submittal by the source of false, incomplete, or misleading information to the NDEE or USEPA;
- (3) A determination by the Director that the permitted source or activity endangers human health or the environment and that the danger cannot be removed by a revision of this permit; or
- (4) The failure of the source to pay a penalty owed pursuant to court order, stipulation and agreement, or order issued by the Administrator of the USEPA;
- (5) A determination by the Director or the Administrator of USEPA that:
 - (a) The permit must be revoked and reissued to assure compliance with the applicable requirements;
 - (b) The permit contains a material mistake or that inaccurate statements were made in the emissions standards or other terms or conditions of the permit;

- (c) An applicable requirement or applicable requirement under the Federal Clean Air Act applies which was not identified by the permittee in its application.
- (E) The following methods may be used to determine compliance with the terms and conditions in this permit (Title 129, Chapter 34, Section 008):
 - (1) Any compliance test method specified in the State Implementation Plan;
 - (2) Any test or monitoring method approved for the source in a permit issued pursuant to Title 129, Chapter 17, 19, or 27;
 - (3) Any test or monitoring method provided for in Title 129; or
 - (4) Any other test, monitoring, or information-gathering method that produces information comparable to that produced by any method described in Condition I.(E)(1) through (3).
- (F) Application for review of plans or advice furnished by the Director will not relieve the source of legal compliance with any provision of these regulations, or prevent the Director from enforcing or implementing any provision of these regulations (Title 129, Chapter 37).
- (G) If and when the Director declares an air pollution episode as defined in Title 129, Chapter 38, Sections 003.01B, 003.01C, or 003.01D, the source shall immediately take all required actions listed in Title 129, Appendix I, Paragraph 1.1, 1.2, and 1.3, respectively, until the Director declares the air pollution episode terminated (Title 129, Chapter 38, Section 003).
- (H) Recordkeeping: To ensure compliance with this permit, records shall be maintained as outlined below. Records include: electronic and/or paper copies of all application materials, notifications, reports, test protocols, test results, and plans; and, electronic and/or original paper copies of all required monitoring results, measurements, inspections, and observations (Title 129, Chapter 34, Section 006; Neb. Rev. Stat. §81-1504):
 - (1) All records required by this permit shall be kept for a minimum of five (5) years and shall be clear and readily accessible to NDEE representatives during an inspection, unless otherwise specified in this permit.
 - (2) Monthly calculations and records required throughout this permit shall be compiled no later than the fifteenth (15th) day of each calendar month and shall include all records and calculations generated through the previous calendar month, unless otherwise specified in this permit.
 - (3) The source shall keep the following records for each malfunction, start-up and shutdown where emissions were, or may have been, in excess of an emission limitation or standard (Title 129, Chapter 6, Sections 002 and 005; Chapter 11; and Chapter 35, Sections 002, 004 and 005):
 - (a) The identity of the equipment.
 - (b) Reason for, or cause of, the malfunction, shutdown, or start-up.
 - (c) Duration of period of excess emissions.
 - (d) Date and time of the malfunction, shutdown, or start-up.
 - (e) Physical and chemical composition of pollutants whose emissions are affected by the action.
 - (f) Methods, operating data, and/or calculations used to determine these emissions.
 - (g) Quantification of emissions in the units of the applicable emission control regulation.

- (h) All measures utilized to minimize the extent and duration of excess emissions during the malfunction, shutdown, and start-up.
- (4) The source shall keep records of maintenance performed on components of permitted emission units that would affect or potentially affect the emission rate of that unit and on control and monitoring equipment associated with the permitted emission unit (Title 129, Chapter 11, Section 001; Chapter 34, Section 006; and Chapter 35, Sections 006.02 and 006.05).
- (5) All records of opacity readings, instrument readings, visual equipment inspections, log book/sheet entries, and any other record of equipment performance shall identify the individual who entered the record, except for continuously generated electronic records.
- (6) Operation and maintenance manuals, or equivalent documentation, detailing proper operation and maintenance of all permitted emission units, required control equipment and required monitoring equipment shall be kept for the life of the equipment
- (I) All permitted emission units, associated emissions conveyances, required control equipment, and required monitoring equipment shall be properly installed, operated, and maintained (Title 129, Chapter 34, Section 006; Chapter 17; Chapter 8, Sections 002 and 015).
- (1) All emissions from emission units using required controls shall be captured and routed through associated emission conveyances to the required control equipment, except for uncaptured emissions described in the permit application and any additional information submitted prior to permit issuance.
- (2) All equipment must be maintained to minimize the amount of uncontrolled pollutants that are released to the atmosphere. Proper equipment maintenance activities may include repair or replacement, and include, but are not limited to activities in response to the following:
 - (a) cracks, holes or gaps,
 - (b) broken, cracked, or otherwise damaged seals or gaskets, and
 - (c) broken, missing or open hatches, access covers, caps, or other closure devices.
- (J) In the event of any discrepancies between applicable federal air standards and the terms and conditions of this permit, the source must meet the most stringent (Neb. Rev. Stat. §81-1504).
- (K) Open fires are prohibited except as allowed by Title 129, Chapter 30.
- (L) Particulate Matter – General Requirements (Title 129, Chapter 32):
 - (1) The source shall not cause or permit the handling, transporting or storage of any material in a manner which allows particulate matter to become airborne in such quantities and concentrations that it remains visible in the ambient air beyond the property line.
 - (2) The source shall not cause or permit the construction, use, repair or demolition of a building, its appurtenances, a road, a driveway, or an open area without applying all reasonable measures to prevent particulate matter from becoming airborne and remaining visible beyond the property line. Such measures include, but are not limited to, paving or frequent cleaning of roads, driveways and parking lots; application of dust-free surfaces; application of water; and planting and maintenance of vegetative ground cover.
- (M) Testing:
 - (1) Performance testing if required by this permit or required by the NDEE shall be completed as follows:

- (a) The source shall provide the NDEE at least thirty (30) days written notice prior to testing to afford the NDEE an opportunity to have an observer present. The NDEE may, in writing, approve a notice of less than 30 days. If the testing is pursuant to an underlying requirement contained in a federal rule, the notice provisions of the underlying requirement apply (Title 129, Chapter 34, Section 003).
- (b) The notification required by Condition I.(M)(1)(a) shall include the following (Title 129, Chapter 34, Section 003):
 - (i) Facility Name, Address and FID number.
 - (ii) Company Name, Address and Contact Person's name.
 - (iii) Test schedule including date and estimated start time of testing.
 - (iv) List all applicable regulatory requirements that testing is being conducted for (permit condition, MACT, NSPS, etc.).
 - (v) Types of pollutants to be sampled including applicable emission limits and demonstration requirements.
 - (vi) Test methods and documentation of any proposed variations from the specified procedures and reason for variance.
- (c) Testing shall be conducted according to the methodologies found in Title 129, Chapter 34, Section 002, or other NDEE approved methodologies (Title 129, Chapter 34, Section 002).
- (d) Performance tests shall be performed under those representative (normal) conditions that: represent the range of combined process and control measure conditions under which the facility expects to operate (regardless of the frequency of the conditions); and are likely to most challenge the emissions control measures of the facility with regard to meeting the applicable emission standards, but without creating an unsafe condition. (Title 129, Chapter 34, Section 007).
- (e) Performance tests shall be conducted for a minimum of three (3) one-hour runs unless another run-time is specified by the applicable Subpart or as deemed appropriate by the NDEE.
- (f) The source shall monitor and record the operating parameters for process and control equipment during the performance testing required in the permit.
- (g) A certified written copy of the test results, signed by the person conducting the test, shall be provided to the NDEE within sixty (60) days of completion of the test, unless a different time period is specified in the underlying requirements of an applicable federal rule, and will, at a minimum, contain the following items (Title 129 Chapter 34, Section 002.07):
 - (i) A description of:
 - 1. The operating parameters for the emissions unit during testing. Examples include, but are not limited to, production rates, process throughputs, firing rates of combustion equipment, or fuel usage; and,
 - 2. The operating parameters for the control equipment during testing. Examples include, but are not limited to, baghouse fan speeds, scrubber liquid flow rates, or pressure drop across the control device.
 - (ii) Copies of all data sheets from the test run(s).

- (iii) A description and explanation of any erroneous data or unusual circumstance(s) and the cause for such situation.
 - (iv) A final conclusion section describing the outcome of the testing.
- (N) When the source makes physical or operational changes to an emissions unit or associated control equipment that may cause an increase in emissions that makes the original testing not representative of current operating conditions or emissions, the source shall submit a notification of the change. Such notification shall be received by NDEE within fifteen (15) days after such change. The NDEE may require performance testing based on review of the specific changes identified in the notification and the resulting potential impact on emissions from the unit(s) and/or performance of the control equipment (Title 129, Chapter 34, Section 001).
- (1) This notification requirement applies to emissions units and/or control equipment that meet the following requirements, except as provided in Condition I.(N)(5):
 - (a) Emissions from the emissions unit and/or control equipment is subject to an emissions limit;
 - (b) A valid performance test has been conducted for the pollutant to which the emissions limit applies;
 - (c) Changes that may cause emissions to increase or invalidate prior testing include, but are not limited to, increasing the capacity of an emissions unit, changing the operational parameters of any control equipment outside of the range allowed for under this permit that makes the control equipment less efficient, changing the type of scrubber packing, or increasing the inlet pollutant loading of any control equipment.
 - (2) For emission units that have had a performance test conducted after January 1, 2012, the source shall make a one-time notification to the NDEE within fifteen (15) days of when there is a ten (10) percent increase in daily production/throughput rate, over the tested rate recorded during the most recent valid performance test unless otherwise specified in this permit. If there are subsequent ten (10) percent increases over the rate most recently notified to the NDEE, the source shall make a one-time notification to the NDEE of each such subsequent increase. This will not apply to emissions that already have emission rates that are normalized to production and/or throughput rates.
 - (3) The notification shall include the date of the changes, a description of the changes made, and an evaluation of the expected impact on emissions from the emissions units and/or control equipment.
 - (4) The following definitions apply for purposes of Condition I.(N)(2) above:
 - (a) "rate" shall mean the production or throughput of an emissions unit in the same units of production or throughput as the "tested rate" as defined below; and,
 - (b) "tested rate" shall mean the production or throughput rate of an emissions unit as recorded in the most recent valid performance test and reported to the NDEE in the source's written copy of the test results, or test report, documenting the maximum capacity of the unit(s). The tested rate shall be extrapolated to daily. Examples include, but are not limited to, tons per hour to tons per day or gallons per hour to gallons per day.
 - (5) The above notification requirements do not apply when compliance with the emission limitation is demonstrated through the use of a CEMS, PEMS or COMS.
- (O) No person shall cause or allow emissions, from any source, which are of an opacity equal to or

greater than twenty percent (20%), as evaluated by an EPA approved method, or recorded by a continuous opacity monitoring system operated and maintained pursuant to 40 CFR Part 60 Appendix B except as provided for in Chapter 20, Sections 005 and 006 (Title 129, Chapter 20, Section 004)

II. GENERAL OPERATING PERMIT CONDITIONS

The following General Conditions apply to this permit unless otherwise provided for in the Specific Conditions of this permit. Terms and conditions of this permit are in accordance with the requirements of Title 129, Chapter 8.

(A) Submittals/Reporting:

All submittals, including reports, required by Condition II.(A) and Condition I.(M)(1)(g) shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete (Title 129, Chapter 1, Section 135; Chapter 7, Section 008; and Chapter 8, Section 012.01).

The source shall submit reports to the NDEE as follows:

- (1) The source shall submit a report of applicable monitoring and all instances of deviations from permit requirements every six (6) calendar months to the NDEE. The report for the first six (6) months (January through June) shall be submitted by September 30 of each year. The report for the second six (6) months (July through December) shall be submitted by March 31 of the following year (Title 129, Chapter 8, Section 004.03A).
- (2) The source shall report all deviations from permit requirements, including those attributable to start-ups, shutdowns or malfunctions, the probable cause of such deviations, and any corrective actions or preventive measures taken. The probable cause, corrective actions, or preventive measures do not have to be provided if that information has already been submitted in other reports to the NDEE, such as for 40 CFR 60.7; however reported deviations must reference these other reports. All reports of deviations must be submitted within the time frame as per Conditions II.(A)(2)(a), (b), and (c) below (Title 129, Chapter 11, Chapter 8, Sections 004.03B and 004.04, and Chapter 35, Sections 004 and 005).
 - (a) Any deviation resulting from emergency or upset conditions shall be reported within two (2) working days of the date on which the permittee first becomes aware of the deviation if the source wishes to assert the affirmative defense authorized under Chapter 11 of Title 129. The report may be submitted initially without a certification by the responsible official, as required by Condition II.(A) above, if an appropriate certification is provided within ten (10) days thereafter, together with the information required under Condition II.(A)(2) and any corrected or supplemental information required concerning the deviation.
 - (b) Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported as soon as is practicable. The report may be submitted initially without a certification by a responsible official in accordance with Condition II.(A) above, if an appropriate certification is provided within ten (10) days thereafter, together with any corrected or supplemental information required concerning the deviation.
 - (c) All other deviations shall be reported as per Condition II.(A)(1).
- (3) The source shall submit completed emission inventories electronically utilizing SLEIS for the preceding calendar year to the NDEE by March 31 of each year (Title 129, Chapter 6).
- (4) The source shall submit fees, due July 1 of each year, based on the actual emission tonnage, up to and including 4,000 tons per year for each regulated pollutant for fee purposes, as established in the emission inventory for the previous calendar year (Title 129, Chapter 1, Section 132 and Chapter 8, Section 008 and Chapter 29).
- (5) Certification of compliance with the terms and conditions of this permit, including emission

limitations, standards, or work practices, for the preceding calendar year, shall be submitted to the NDEE and to Nebraska Air Compliance Coordinator, U.S. EPA, Region 7, ECAD/AB, 11201 Renner Boulevard, Lenexa, KS 66219 by March 31 of each year. The report shall be certified by a responsible official in accordance with Condition II.(A) and shall include the following (Title 129, Chapter 8, Section 012.05).

- (a) The identification of each term or condition of the permit that is the basis of the certification;
 - (b) The compliance status;
 - (c) A determination of whether compliance was continuous or intermittent; and
 - (d) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (6) Any emissions due to malfunctions, unplanned shutdowns, and ensuing start-ups that are, or may be in excess of applicable emission limitations shall be reported to the NDEE in accordance with Condition II.(A)(2)(a).
- (B) The source shall comply with 40 CFR part 82, Protection of the Stratospheric Ozone. Affected controlled substances include, but are not limited to: chlorofluorocarbon (CFC) and hydrochlorofluorocarbon (HCFC) refrigerants, solvents and propellants, halons, carbon tetrachloride, and methyl chloroform (specific affected controlled substances are listed in 40 CFR part 82, Subpart A, Appendices A, (Class I) and B (Class II)).
- The following subparts and Sections of 40 CFR part 82 are conditions of this permit:
- Subpart A - Production and Consumption Controls
- Subpart B - Servicing of Motor Vehicle Air Conditioners
- Subpart E - Labeling of Products Using Ozone-Depleting Substances: Sections 82.106 Warning statement requirements, 82.108 Placement of warning statement, 82.110 Form of label bearing warning statement, and 82.112 Removal of label bearing warning statement.
- Subpart F - Recycling and Emissions Reduction: Sections 82.156 Required practices, 82.158 Standards for recycling and recovery equipment, 82.161 Technician certification, and 82.166 Reporting and recordkeeping requirements
- Subpart G - Significant New Alternatives Policy Program
- (C) This permit is issued for a fixed term of five (5) years. A timely renewal application is one that is submitted to the NDEE a minimum of six (6) months and a maximum of eighteen (18) months before permit expiration. Provided a timely and complete renewal application has been submitted, the conditions of this permit shall continue until the effective date of a new permit. (Title 129, Chapter 8, Section 003 and Chapter 7, Section 002.06)
- (D) The source shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Nebraska Environmental Protection Act and/or the Federal Clean Air Act, and is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application (Title 129, Chapter 8, Section 007.01).
- (E) It shall not be a defense for the source in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit (Title 129, Chapter 8, Section 007.02).
- (F) This permit may be modified; revoked, reopened, and reissued; or terminated for cause in

accordance with Title 129 and Title 115, Rules of Practice and Procedure. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not supersede any permit condition (Title 129, Chapter 8, Section 007.03).

- (G) Conditions under which this permit will be reopened, revoked and reissued or terminated during its term for cause, include but are not limited to (Title 129, Chapter 15, Section 006 and Chapter 8, Section 010):
- (1) Additional applicable requirements under the Nebraska Environmental Protection Act or the Federal Clean Air Act, which become applicable to this source with a remaining permit term of three (3) or more years. No such reopening will occur if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended;
 - (2) Additional requirements, including excess emissions requirements, that become applicable to an affected source under the acid rain program under Chapter 26.
- (H) This permit does not convey any property rights of any sort, or any exclusive privilege (Title 129, Chapter 8, Section 007.04).
- (I) The source shall furnish to the NDEE, within the time specified by the NDEE, any information requested by the NDEE in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the NDEE copies of records required to be kept in accordance with the permit or, for information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality pursuant to Title 115 - Rules of Practice and Procedure (Title 129, Chapter 8, Section 007.05).
- (J) The provisions of this operating permit incorporate all applicable requirements contained in all previously issued active construction permits. Although the previously issued construction permits are still active, this operating permit will be the compliance and enforcement instrument for all applicable requirements incorporated into the operating permit [40 CFR 70.2 – Applicable Requirements (2)].
- (K) In the event of a challenge to any portions of this permit, the unchallenged permit requirements shall remain valid (Title 129, Chapter 8, Section 006).
- (L) Changes allowed without an operating permit revision (Title 129, Chapter 15, Section 007):
- (1) The source may make the changes identified in Condition II.(L)(1)(a) within a permitted facility without a permit revision if the change is not a modification under Title 129, Chapters 18, 23, 27, or 28; the change does not require a construction permit under Chapters 17 or 19; and the change does not result in the emissions allowable under the permit (whether expressed therein as a rate of emissions or in the terms of total emissions) being exceeded (Title 129, Chapter 15, Section 007.01).
 - (a) Changes in the configuration of the facility's equipment, defined as "Section 502(b)(10) changes", as defined in Title 129, Chapter 1, Section 139 (Title 129, Chapter 15, Section 007.01A). Written notification of these changes shall be sent to the NDEE and the administrator of EPA as follows:
 - (i) Non-Emergencies (Title 129, Chapter 1, Section 139; Chapter 15, Section 007.01):
 1. Written notification shall be received by the NDEE a minimum of seven (7) days in advance of the proposed changes;

- (ii) Emergencies (Title 129, Chapter 1, Section 139; Chapter 15, Section 007.01):
 - 1. Initial notification shall be made within two working days of the date on which the permittee first becomes aware of the need for the change;
 - 2. A follow-up written notification shall be submitted as soon as practicable; and,
 - 3. The notifications shall include an explanation of the nature of the emergency.
- (iii) Required information (Title 129, Chapter 15, Section 007.01.A):
 - 1. A brief description of the change within the permitted source (Chapter 15, Section 007.01A1);
 - 2. The date on which the change will occur (Chapter 15, Section 007.01A2);
 - 3. Any change in emissions (Chapter 15, Section 007.01A3); and,
 - 4. Any permit term or condition that is no longer applicable as a result of the change (Chapter 15, Section 007.01A4).
- (iv) A copy of the notification shall be attached to the source's copy of the operating permit (40 CFR Part 70.4(b)(12)).
- (2) The source may make changes that are not defined as "Section 502(b)(10) changes" within a permitted facility without a permit revision if the change is not a modification under Title 129, Chapters 18, 23, 27, or 28; and the change is not a change which would require a construction permit under Chapters 17 or 19 (Title 129, Chapter 15, Section 007.02).
 - (a) Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition (Title 129, Chapter 15, Section 007.02A).
 - (b) The source shall provide contemporaneous written notice to the Director and the Administrator of EPA, except for changes that qualify as insignificant activities under the provisions of Title 129, Chapter 7, Sections 006.03 and 006.04. Such written notice shall include (Title 129, Chapter 15, Section 007.02B):
 - (i) A description of each change;
 - (ii) The date the change will be made;
 - (iii) A description of any change in emissions;
 - (iv) A list of the pollutants emitted; and,
 - (v) A list of any applicable requirements that would apply as a result of the change, including terms and conditions established in in the relevant operating permit for synthetic minor purposes.
 - (c) A copy of the notification in Condition II.(L)(2)(b) shall be attached to the source's copy of the operating permit.
 - (d) Any change under Condition II.(L)(2) shall not qualify for a permit shield under Chapter 8, Section 014 (Title 129, Chapter 15, Section 007.02C).
 - (e) The source shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and emissions resulting from those changes (Title 129, Chapter 15, Section 007.02D).

- (f) Upon review of a notice submitted in accordance with Condition II.(L)(2)(b), the NDEE may require a source to apply for an operating permit if the change does not meet the requirements of Condition II.(L)(2) [Title 129, Chapter 15, Section 007.02E].
- (3) Testing requirements:
 - (a) Testing may be required if a change reported under Condition II.(L)(1) or II.(L)(2) involves an emissions unit that was previously tested (Title 129, Chapter 8, Section 004.01B and 015; Chapter 34).
- (M) A permit shield is not granted (Title 129, Chapter 8, Section 014).
- (N) When applicable, the source shall comply with the requirements of 40 CFR Part 68, Chemical Accident Prevention Provisions, Risk Management Plan (RMP), as part of the compliance certification submitted under Condition II.(A)(5). The permittee shall submit a certification statement that the source is in compliance with all requirements of Part 68, including the registration and submission of the RMP (40 CFR 68.215(a); Title 129, Chapter 8, Section 011).

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(A) Specific Conditions for Batch Vapor Degreasing

(1) Permitted Emission Points:

The following table contains a description of emission points, control equipment, emission units, and relevant standards at the source at the time of permit issuance, in accordance with operating permit application OP18R1-030, received September 17, 2018, including any supporting information received prior to issuance of this permit:

Emission Point ID#	Control Equipment ID# and Description	Emission Unit Description	Relevant Standards
357-1	Freeboard Refrigeration Device, Reduced Room Draft, and a Freeboard Ratio of 1	Existing Batch Vapor Degreaser, installed in 1980, and retrofitted in April 1998.	NESHAP 40 CFR 63 Subpart T

(2) Applicable NSPS and NESHAP Requirements

(a) The source shall demonstrate compliance with all applicable NESHAP Subpart A and Subpart T requirements for emission unit 357-1 [Title 129, Chapter 28, Section 001.01 and 001.05].

(b) No NSPS requirements are applicable to the emission units listed in Condition III.(A)(1).

(3) Emission Limitations and Testing Requirements:

(a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Standard Condition I.(M).

Emission Point ID#	Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
357-1	Perchloroethylene (PCE) Only	4,800 kg ^[1]	Weighted 12-month rolling average	40 CFR 63 Subpart T; Title 129, Chapter 28, Section <u>001.05</u>	No
	Trichloroethylene (TCE) Only	14,100 kg ^[1]	Weighted 12-month rolling average	40 CFR 63 Subpart T; Title 129, Chapter 28, Section <u>001.05</u>	No
	Methylene Chloride (MC) Only	60,000 kg ^[1]	Weighted 12-month rolling average	40 CFR 63 Subpart T; Title 129, Chapter 28, Section <u>001.05</u>	No
	Multiple Solvents	60,000 kg ^[2]	Weighted 12-month rolling average	40 CFR 63 Subpart T; Title 129, Chapter 28, Section <u>001.05</u>	No

^[1] Compliance demonstrated as specified in Condition III.(A)(3)(b) and (A)(4).

^[2] Compliance based on the MC-weighted emissions using the equation in 40 CFR 63.471(b)(2) – Equation 9 of NESHAP Subpart T.

- (b) The source shall comply with all applicable emission limitations and testing requirements in NESHAP Subpart T for Emission Unit 357-1 [Title 129, Chapter 28, Section 001.05].
- (i) The following equation is used to determine the weighted 12-month rolling total emissions when multiple solvents are used. [40 CFR 63.471(b)(2) Equation 9]

$$WE = (PCE \times A) + (TCE \times B) + (MC)$$

Where:

WE = Weighted 12-month rolling total emissions in kg (lbs).

PCE = 12-month rolling total PCE emissions from all solvent cleaning machines at the facility in kg (lbs).

A = 12.5 carcinogenic potency for PCE relative to that of MC.

TCE = 12-month rolling total TCE emission from all solvent cleaning machines at the facility in kg (lbs).

B = 4.25 carcinogenic potency for TCE relative to that of MC.

MC = 12-month rolling total MC emissions from all solvent cleaning machines at the facility in kg (lbs).

(4) Operational and Monitoring Requirements:

- (a) The source shall comply with all applicable operational and monitoring requirements in NESHAP Subpart T for emission unit 357-1 [Title 129, Chapter 28, Section 001.05].
- (i) The batch vapor cleaning machine shall comply with the following standards and design requirements: [40 CFR 63.463]
 - 1. The vapor cleaning machine shall be employed with a control combination of a freeboard refrigeration device, reduced room draft and a freeboard of 1 [40 CFR 63.463(b)(2)(i)-Option 6, and 40 CFR 63.463(a)(1)(ii) and (a)(2)].
 - 2. The cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts [40 CFR 63.463(a)(3)].
 - 3. The vapor cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser [40 CFR 63.463(a)(5)].
 - 4. The vapor cleaning machine shall have a primary condenser [40 CFR 63.463(a)(6)].
- (ii) The batch vapor cleaning machine shall be operated as follows: [40 CFR 63.463(d)]
 - 1. Control air disturbances across the cleaning machine opening by incorporating a reduced room draft as described in Conditions III.(A)(4)(a)(iii) 1.B. and C [40 CFR 63.463(d)(1)(ii)]
 - 2. The parts baskets or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute

- (3 feet per minute) or less [40 CFR 63.463(d)(2)].
3. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine) [40 CFR 63.463(d)(3)].
 4. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the Department [40 CFR 63.463(d)(4)].
 5. Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped [40 CFR 63.463(d)(5)].
 6. During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater [40 CFR 63.463(d)(6)].
 7. During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off [40 CFR 63.463(d)(7)].
 8. When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface [40 CFR 63.463(d)(8)].
 9. Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the Department's satisfaction to achieve the same or better results as those recommended by the manufacturer [40 CFR 63.463(d)(9)].
 10. Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in Appendix A of 40 CFR 63 if requested during an inspection by the Department [40 CFR 63.463(d)(10)].
 11. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container [40 CFR 63.463(d)(11)].
 12. Sponges, fabric, wood, and paper products shall not be cleaned. [40 CFR 63.463(d)(12)]
- (iii) The batch vapor cleaning machine control combination, Condition III.(A)(4)(a)(i)1., used to comply with Condition III.(A)(4)(a)(i) shall be monitored as follows: [40 CFR 63.463(e) and 63.466]
1. Determine during each monitoring period whether each control device used to comply with these standards meets the following requirements [40 CFR 63.463(e)(2)].
 - A. Ensure weekly that the chilled air blanket temperature (in °F), measured at the center of the air blanket during idling mode, is no greater than 30% of the solvent boiling point (57 °F for trichloroethylene). Either a thermocouple or

- thermometer is an acceptable measuring device to measure the temperature at the center of the air blanket during the idling mode. [40 CFR 63.463(e)(2)(i) and 40 CFR 63.466(a)(1)]
- B. Ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures in Condition III.(A)(4)(a)(iii)5. [40 CFR 63.463(e)(2)(ii)(A).
 - C. Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in Condition III.(A)(3)(a)(iii)5. [40 CFR 63.463(e)(2)(ii)(B)]
2. If any of the requirements of Condition III.(A)(4)(a)(iii)1. are not met, determine whether an exceedance has occurred using the criteria as follows: [40 CFR 63.463(e)(3)]
 - A. An exceedance has occurred if the requirements of Condition III.(A)(4)(a)(iii)1.C. have not been met. [40 CFR 63.463(e)(3)(i)]
 - B. An exceedance has occurred if the requirements of Conditions III.(A)(4)(a)(iii)1.A. and B. have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be re-measured immediately upon adjustment or repair and demonstrated to be within required limits. [40 CFR 63.463(e)(3)(ii)]
 3. The source shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in Condition III.(A)(5)(a)(ii)2. [40 CFR 63.463(e)(4)]
 4. The Source shall monitor the hoist speed as follows: [40 CFR 63.466(c)]
 - A. Determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute). [40 CFR 63.466(c)(1)]
 - B. The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Source may begin monitoring the hoist speed quarterly. [40 CFR 63.466(c)(2)]
 - C. If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated. [40 CFR 63.466(c)(3)]
 5. The source shall monitor reduced room draft and record the results as follows: [40 CFR 63.466(d)]
 - A. Reduced room draft is maintained by controlling room parameters (i.e., redirecting fans, closing doors and windows, etc.), thus the Source shall conduct quarterly monitoring of wind speed, and weekly monitoring of room parameters as follows: [40 CFR 63.466(d)(1)]
 - a. Measure the wind speed within six (6) inches above the top of the freeboard area of the solvent cleaning machine using the procedure

specified as follows: [40 CFR 63.466(d)(1)(i)]

- b. Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located. [40 CFR 63.466(d)(1)(i)(A)]
 - c. Orient a velometer in the direction of the wind current at each of the four corners of the machine. [40 CFR 63.466(d)(1)(i)(B)]
 - d. Record the reading for each corner. [40 CFR 63.466(d)(1)(i)(C)]
 - e. Average the values obtained at each corner and record the average wind speed. [40 CFR 63.466(d)(1)(i)(D)]
- B. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft. [40 CFR 63.466(d)(1)(ii)]
- (iv) The source must maintain a log of solvent additions and deletions for each solvent cleaning machine. [40 CFR 63.471(b)(1)]
- (v) The source shall on the first operating day of every month, demonstrate compliance with the applicable facility-wide emission limit given in Condition III.(A)(3)(a) on a 12-month rolling total basis using the following procedures. [40 CFR 63.471(c)]
1. The source shall ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soiled materials. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions as specified in Conditions III.(A)(4)(a)(v)2. and 3. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations. [40 CFR 63.471(c)(1)]
 2. The source shall, using the records of all solvent additions and deletions for the previous month, determine solvent emissions (E_{unit}) from the solvent cleaning machine using the following equation: [40 CFR 63.471(c)(2) and Equation 10]

$$E_{\text{unit}} = SA_i - LSR_i - SSR_i$$

Where:

E_{unit} = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent month i , (kilograms of solvent per month).

SA_i = the total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the most recent month i , (kilograms of solvent per month).

LSR_i = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the most recent month i , (kilograms of solvent per month).

SSR_i = the total amount of halogenated HAP solvent removed from the solvent cleaning machine in solid waste, obtained as described in

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Condition III.(A)(4)(a)(v)3., during the most recent month i,
(kilograms of solvent per month).

3. The source shall determine SSR_i using either of the following two methods. [40 CFR 63.471(c)(3)]
 - A. From tests conducted using EPA reference method 25d.
 - B. By engineering calculations included in the compliance report.
4. The source shall on the first operating day of the month, after 12 months of emissions data are available, determine the 12-month rolling total emissions, ET_{unit} , for the 12-month period ending with the most recent month using the following equation: [40 CFR 63.471(c)(4) and Equation 11]

$$ET_{unit} = \left[\sum_{j=1}^{12} E_{unit} \right]$$

Where:

ET_{unit} = the total halogenated HAP solvent emissions over the preceding 12 months, (kilograms of solvent emissions per 12-month period).

E_{unit} = halogenated HAP solvent emissions for each month (j) for the most recent 12 months (kilograms of solvent per month).

5. The source shall on the first operating day of the month, after 12 months of emissions data are available, determine the 12-month rolling total emissions, $ET_{facility}$, for the 12-month period ending with the most recent month using the following equation: [40 CFR 63.471(c)(5) and Equation 12]

$$ET_{facility} = \left[\sum_{j=1}^i ET_{unit} \right]$$

Where:

$ET_{facility}$ = the total halogenated HAP solvent emissions over the preceding 12 months for all cleaning machines at the facility, (kilograms of solvent emissions per 12-month period).

ET_{unit} = the total halogenated HAP solvent emissions over the preceding 12 months for each unit j, where i equals the total number of units at the facility (kilograms of solvent emissions per 12-month period).

- (vi) If the applicable facility-wide emission limit presented in Condition III.(A)(3)(a) is not met, an exceedance has occurred. All exceedances shall be reported as required in III.(A)(5)(a)(ii)2. [40 CFR 63.471(d)]

(5) Recordkeeping and Reporting Requirements:

- (a) The source shall comply with all applicable recordkeeping and reporting requirements in NESHAP Subpart T for emission unit 357-1 [Title 129, Chapter 28, Section 001.05].
 - (i) The batch vapor cleaning machine recordkeeping requirements shall be the following:

1. The batch vapor cleaning machine complying with provisions of this permit shall maintain records in written or electronic form specified in the following paragraphs for the lifetime of the machine: [40 CFR 63.467(a)]
 - A. Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment. [40 CFR 63.467(a)(1)]
 - B. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date of installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993 may be substituted. [40 CFR 63.467(a)(2)]
 - C. Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine subject to the provisions of this permit. [40 CFR 63.467(a)(5)]
 2. The batch vapor cleaning machine complying with provisions of this permit shall maintain records in written or electronic form specified in the following paragraphs for a period of 5 years: [40 CFR 63.467(b)]
 - A. Records of the results of control device monitoring required by Conditions III.(A)(4)(a)(iii)1., 4., and 5. [40 CFR 63.467(b)(1)]
 - B. Information on the actions taken to comply with Conditions III.(A)(4)(a)(iii)1., 2., and 3. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels. [40 CFR 63.467(b)(2)]
 - C. Estimates of annual solvent consumption for the solvent cleaning machine. [40 CFR 63.467(b)(3)]
- (ii) The batch vapor cleaning machine reporting requirements shall be the following: [40 CFR 63.468(f)]
1. The source shall submit an annual report by March 31 of the year following the one for which the reporting is being made. This report shall include the requirements as follows: [40 CFR 63.468(f)(1) and 40 CFR 63.10(a)(5)]
 - A. A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in Condition III.(A)(4)(a)(ii)10." [40 CFR 63.468(f)(1)]
 - B. An estimate of solvent consumption for each solvent cleaning machine during the reporting period. [40 CFR 63.468(f)(2)]
 2. The source shall submit an exceedance report to the Department semiannually except when, the Department determines, on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Source shall follow a quarterly reporting format until a request to reduce reporting frequency under Condition III.(A)(5)(a)(ii)3. is approved. Semiannual exceedance reports shall be delivered or postmarked by March 31 and September 30.

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Quarterly exceedance reports shall be delivered or postmarked by the last day of the next quarter (i.e., June 30, September 30, December 31, and March 31), as appropriate. The exceedance report shall include the applicable information as given below: [40 CFR 63.468(h)]

- A. Information on the actions taken to comply with Conditions III.(A)(4)(a)(iii)1., 2. And 3. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels. [40 CFR 63.468(h)(1)]
 - B. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken. [40 CFR 63.468(h)(2)]
 - C. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report. [40 CFR 63.468(h)(3)]
3. The source who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met. [40 CFR 63.468(i)]
- A. The source has demonstrated a full year of compliance without an exceedance. [40 CFR 63.468(i)(1)]
 - B. The source continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63 Subpart A (General Provisions) and in 40 CFR 63 Subpart T. [40 CFR 63.468(i)(2)]
 - C. The Department does not object to a reduced frequency of reporting for the affected source as provided in 40 CFR 63.10(e)(3)(iii) of 40 CFR 63 subpart A (General Provisions). [40 CFR 63.468(i)(3)]
- (iii) The source shall maintain the following records either in electronic or written form for a period of five (5) years. [40 CFR 63.471(e)]
1. The dates and amounts of solvent that are added to each solvent cleaning machine. [40 CFR 63.471(e)(1)]
 2. The solvent composition of wastes removed from each solvent cleaning machines as determined using the procedure described in Condition III.(A)(4)(a)(v)3. [40 CFR 63.471(e)(2)]
 3. Calculation sheets showing how monthly emissions and the 12-month rolling total emissions from each solvent cleaning machine were determined, and the results of all calculations. [40 CFR 63.471(e)(3)]
- (iv) The source shall submit a solvent emission report every year. This solvent emission report shall contain the following requirements. [40 CFR 63.471(h)]
1. The average monthly solvent consumption for the affected facility in kilograms per month. [40 CFR 63.471(h)(1)]
 2. The 12-month rolling total solvent emission estimates calculated each month using the method as described in Condition III.(A)(4)(a)(v). [40 CFR 63.471(h)(2)]
 3. This report can be combined with the annual report required in Condition

III.(A)(5)(a)(ii)1. into a single report for the facility. [40 CFR 63.471(h)(3)]

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III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(B) Specific Conditions for Paint Burn Off Oven

(1) Permitted Emission Points:

The following table contains a description of emission points, control equipment, emission units, and relevant standards at the source at the time of permit issuance, in accordance with operating permit application OP18R1-030, received September 17, 2018, including any supporting information received prior to issuance of this permit:

Emission Point ID#	Control Equipment ID# and Description	Emission Unit Description	Relevant Standards
358-4	None	Paint Burn Off Oven (Pyrolysis® Cleaning Furnace, Model: PTR-150), with a 0.3 MMBtu/hr natural gas burner, equipped with an afterburner, 10 lb/hr charging rate capacity, installed in 1989.	None

(2) Applicable NSPS and NESHAP Requirements

- (a) At the time of permit issuance, there are no NSPS or NESHAP requirements applicable to the emission unit listed in Condition III.(B)(1).

(3) Emission Limitations and Testing Requirements:

- (a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Standard Condition I.(M).

Emission Point ID#	Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
358-4	PM (filterable)	0.10 gr/dscf @ 7% O ₂	Three 1-hour periods	Title 129, Chapter 22, Section 002; Construction Permit Issued December 13, 2002, Condition XIII.(A).	No ^[1]

^[1] Compliance of PM limits are demonstrated by compliance with Conditions III.(B)(4)(a), (b), and (c). The Department may require testing in accordance with Condition III.(B)(3)(b) to demonstrate compliance with these limits.

- (b) The Department may require testing to demonstrate compliance with Condition III.(B)(3)(a). [Construction Permit CP02-0030, issued December 13, 2002, Condition XIII.(A)]
- (i) If the Department requires testing, an emission testing protocol shall be submitted and must be approved by the Department before emission testing is conducted. Testing will be conducted according to EPA Method 5 (40 CFR 60, Appendix A), Title 129, Chapter 22, Section 004, and Title 129, Chapter 34. The source shall notify the Department of the anticipated testing date at least 30 days prior to such date for any testing performed to demonstrate compliance with this permit. A written report of performance test results shall be furnished to the Department within 60 days after completion of the tests.
- (ii) If the Department requires testing, performance tests shall be by an independent testing

firm to demonstrate compliance with Condition III.(B)(3)(a). Testing will be conducted according to EPA Method 5 (40 CFR 60, Appendix A), Title 129, Chapter 22, Section 004, and Title 129, Chapter 34. Three separate test runs shall be conducted. The sampling time and sample volume for each run shall be at least 60 minutes and 31.8 dry standard cubic feet.

(4) Operational and Monitoring Requirements:

- (a) The burn-off oven shall be properly installed, maintained, and operated at all times. Instructions for proper inspection, maintenance, and operation of the burn-off furnace, which include the terms and conditions of this permit, shall be posted on-site. [Title 129, Chapter 22, Section 005; Construction Permit issued December 13, 2002, Condition XIII.(C)]
- (b) Materials burned in the burn-off oven shall be limited to coatings on metal parts. [Construction Permit CP02-0030, issued December 13, 2002, Condition XIII.(D)].
- (c) Fuel for the burn-off oven's main burner and afterburner shall be limited to natural gas [Construction Permit CP02-0030, issued December 13, 2002, Condition XIII.(E)].

(5) Recordkeeping and Reporting Requirements:

- (a) Records shall be maintained on-site for a minimum period of five (5) years. These records shall be clear and readily accessible to Department representatives and shall include the following: [Construction Permit CP02-0030, issued December 13, 2002, Condition XIII(F)]
 - (i) To demonstrate compliance with Condition III.(B)(4)(a):
 - 1. Written certification that the burn-off oven has been installed per the manufacturer's recommendations and requirements.
 - 2. Records showing when routine inspection and maintenance was performed and what, if any, corrective actions or repairs were completed.
 - 3. Written certification that each burn-off oven operator has read and understands the instructions for proper operation of the unit, which includes the terms and conditions of this permit; and intends to comply with the burn-off oven operating instructions.
 - (ii) To demonstrate compliance with Condition III.(B)(4)(b), a list of the materials burned during each charge.
 - (iii) To demonstrate compliance with Condition III.(B)(4)(c), the type of burn-off oven fuel consumed shall be recorded.

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(C) Specific Conditions for Painting Operations

(1) Permitted Emission Points:

The following table contains a description of description of emission points, control equipment, emission units, and relevant standards at the source at the time of permit issuance, in accordance with operating permit application OP18R1-030, received September 17, 2018, including any supporting information received prior to issuance of this permit:

Emission Point ID#	Control Equipment ID# and Description	Emission Unit Description	Relevant Standards
358-1	Dry Filter system with 98% control efficiency	Powder Paint Booth – automatic spray area; Booth contains a color module which filters and recycles overspray powder paint	None
358-2	Dry Filters with a 98% control efficiency	Powder Paint Booth – touch-up; and Lacquer – spray painting	None
358-5	None	Dip Painting Operation - Water Based	None

(2) Applicable NSPS and NESHAP Requirements

- (a) At the time of permit issuance, there are no NSPS or NESHAP requirements applicable to the emission units listed in Condition III.(C)(1).

(3) Emission Limitations and Testing Requirements:

Except for applicable requirements prescribed in Standard Condition I and General Condition II, this condition establishes no additional specific emission limitations or testing requirements for the emission points or emission units identified in Condition III.(C)(1).

(4) Operational and Monitoring Requirements:

- (a) Operation and maintenance of dry filter system and dry filters shall be in accordance with the following requirements: [Title 129, Chapter 20 Sections 001 and 004, and Chapter 8 Section 004]
- (i) The dry filter system and dry filters shall be operated and be controlling emissions at all times when the associated emission units are in operation.
- (ii) Dry filter system and dry filters shall be inspected and replaced in accordance with the operation and maintenance manual or more frequently, as indicated by filter failure, to ensure proper operation.
- (iii) Routine observations at least once each day during daylight hours of dry filter system and dry filters operation shall be conducted to determine whether there are leaks, noise, or other indications that may necessitate corrective action. If corrective action is necessary, it shall occur immediately.

(5) Recordkeeping and Reporting Requirements:

- (a) Monthly records shall be kept for the emission units 358-1, 358-2, and 358-5 to demonstrate that this source is not subject to 40 CFR 63, Subpart Mmmm [Title 129, Chapter 28, Section 001.81] for NESHAP for Miscellaneous Metal Parts and Products surface coating at major sources of HAP. The records shall include for each chemical used, excluding powder paints, in the surface coating operation (including associated activities, such as surface preparation, cleaning, mixing, and storage) [Title 129, Chapter 8, Sections 004.02 and 013]:
 - (i) Certified Data Product Sheets or Material Safety Data Sheets (MSDS) for each chemical used.
 - (ii) Volume of each chemical used (in gallons).
- (b) The source shall maintain the following records for the dry filter system and dry filters: [Title 129, Chapter 8, Section 004.02]
 - (i) Fabric filter replacement records including the date the fabric filter replacement occurred and the type of filter installed.
 - (ii) Records documenting the date, time, routine observations and inspections, and any corrective actions taken for each day the associated dry filter system and dry filters are in operation.

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(D) Specific Conditions for Process Boiler/Heaters

(1) Permitted Emission Points:

The following table contains a description of emission points, control equipment, emission units, and relevant standards at the source at the time of permit issuance, in accordance with operating permit application OP18R1-030, received September 17, 2018, including any supporting information received prior to issuance of this permit:

Emission Point ID#	Control Equipment ID# and Description	Emission Unit Description	Relevant Standards
351-2	None	0.5 MMBtu/hr natural gas-fired zinc die cast process heater (integrated with die cast machine), existing unit, installed in 1946.	NESHAP 40 CFR Part 63, Subparts A and DDDDD
357-2	None	0.59 MMBtu/hr natural gas-fired degreaser boiler, new unit, installed in 2015.	NESHAP 40 CFR Part 63, Subparts A and DDDDD

(2) Applicable NSPS and NESHAP Requirements

- (a) At the time of permit issuance, there are no NSPS requirements applicable to the emission units listed in Condition III.(D)(1).
- (b) The source shall demonstrate compliance with all applicable NESHAP Subpart A and DDDDD requirements for emission units 351-2 and 357-2 [Title 129, Chapter 28, Section 001.70].

(3) Emission Limitations and Testing Requirements:

- (a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Standard Condition I.(M).

Emission Point ID#	Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
351-2	SO _x	2.5 lb/MMBtu ^{[1],[2]}	2 hours	Title 129, Chapter 24, Section 001	No

^[1] Compliance with Condition III.(D)(4)(b) demonstrates compliance with the PM, Opacity and SO_x limits

^[2] Applies to combustion units installed prior to February 26, 1974.

- (b) The source shall comply with all applicable emission limitations and testing requirements in NESHAP Subpart DDDDD for emission units 351-2 and 357-2 [Title 129, Chapter 28, Section 001.70].

(4) Operational and Monitoring Requirements:

- (a) The source shall comply with all applicable operational and monitoring requirements in NESHAP Subpart DDDDD for emission units 351-2 and 357-2 [Title 129, Chapter 28, Section 001.70].
 - (i) At all times, the process heater and boiler must be operated and maintained in a

manner consistent with safety and good air pollution control practices for minimizing emissions. Determinations of whether such operation and maintenance procedures are being used will be based on information available to the Department that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of source [40 CFR 63.7500(a)(3)].

(ii) Boilers and process heaters in the units designed to burn gas 1 fuels subcategory with a heat input capacity of less than or equal to 5 million Btu per hour must complete a tune-up every five (5) years as specified in NESHAP Subpart DDDDD [40 CFR 63.7540]. The tune-up consists of the following:

1. As applicable, inspect the burner, and clean or replace any components of the burner as necessary. At units where entry into a piece of process equipment or into a storage vessels is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. The burner inspection may be delayed until the next scheduled or unscheduled unit shutdown, but the owner/operator must inspect each burner at least once every 72 months. [40 CFR 63.7540(a)(10)(i)]
2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specification, if available. [40 CFR 63.7540(a)(10)(ii)]
3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and function properly. This inspection may be delayed until the next scheduled unit shutdown. [40 CFR 63.7540(a)(10)(iii)]
4. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject. [40 CFR 63.7540(a)(10)(iv)]
5. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR 63.7540(a)(10)(v)]
6. Maintain on-site and submit, if requested by the Department, an annual report containing the following information: [40 CFR 63.7540(a)(10)(vi)]
 - A. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater; and
 - B. A description of any corrective actions taken as part of the tune-up.
7. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. [40 CFR 63.7540(a)(13)]

(b) Fuel for the emission units 351-2 and 357-2 shall be limited to natural gas.

(5) Recordkeeping and Reporting Requirements:

- (a) The source shall comply with all applicable recordkeeping and reporting requirements in NESHAP Subpart DDDDD for emission units 351-2 and 357-2 [Title 129, Chapter 28,

Section 001.70]

- (i) The owner or operator must submit a signed statement in the Notification of Compliances Status report that the owner or operation has conducted a tune-up of each existing unit with a heat input capacity of less than 10 million Btu per hour or each unit in the unit designed to burn gas 1 subcategory.
- (ii) If the owner or operator have made a physical change to the boiler and the physical change resulted in the applicability of a different subcategory, the owner or operator must provide notice of the date upon the physical change was made within 30 days of the change. The notification must identify:
 - 1. The name of the owner or operator of the affected source, the location of the source, the boiler(s) and process heater(s) that were physically changed, and the date of the notice.
 - 2. The current applicable subcategory under NESHAP Subpart DDDDD.
- (iii) The compliance report must contain the following:
 - 1. Company and Facility name and address.
 - 2. Process unit information, emission limitations, and operating parameter limitations.
 - 3. Date of report and beginning and ending dates of the reporting period.
 - 4. The total operating time during the reporting period.
 - 5. The date of the most recent tune-up for each unit for each unit, including the date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.
 - 6. If there are no deviations from the requirements for work practice standards in Table 3 of NESHAP Subpart DDDDD that apply to this facility, a statement that there were no deviations from the work practice standards during the reporting period.
 - 7. If there is a deviation from a work practice standard during the reporting period, the report must contain:
 - A. A description of the deviation and the work practice standard from which the deviation occurred.
 - B. Information on the number, duration, and cause of deviations (including unknown cause), as applicable, and the corrective action taken.
 - 8. The compliance report must be submitted at least once every 5-year period following the compliance date electronically using CEDRI that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to NESHAP Subpart DDDDD is not available in CEDRI at the time that the report is due, the owner or operator must submit the report to EPA Region 7 and NDEE.
- (iv) The owner or operator must keep the following records:[40 CFR 63.7555 (a)]
 - 1. A copy of each notification and report that was submitted to comply with NESHAP Subpart DDDDD, including all documentation supporting any Initial

Notification or Notification of Compliance Status or compliance reported that was submitted.

2. Records of compliance demonstrations.
3. Records of the type(s) and amount(s) of fuels used during each startup and shutdown.

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(E) Specific Conditions for Zinc Process Equipment

(1) Permitted Emission Points:

The following table contains a description of emission points, control equipment, emission units, and relevant standards at the source at the time of permit issuance, in accordance with operating permit application OP18R1-030, received September 17, 2018, including any supporting information received prior to issuance of this permit:

Emission Point ID#	Control Equipment ID# and Description	Emission Unit Description	Relevant Standards
351-1	None	Zinc die cast machine, maximum capacity of 207 lb/hr zinc, installed in 1946.	None
359-1	None ^[1]	Zinc Electroplating Lines (rack and barrel process) – the chromic acid tank uses passivation (no electrical current) to apply chromium to part.	None

^[1] Emission Point ID# 359-1 has 4 high efficiency (99% control) wet scrubbers to control HCl and alkaline vapors. The facility is not claiming the control efficiency in emission calculations and the scrubbers are not required by any Title 129 regulations. Therefore, the scrubbers are not regulated by this permit.

(2) Applicable NSPS and NESHAP Requirements

At the time of permit issuance, there are no NSPS or NESHAP requirements applicable to the emission units listed in Condition III.(E)(1).

(3) Emission Limitations and Testing Requirements:

Except for applicable requirements prescribed in Standard Condition I and General Condition II, this condition establishes no additional specific emission limitations or testing requirements for the emission points or emission units identified in Condition III.(E)(1).

(4) Operational and Monitoring Requirements:

Except for applicable requirements prescribed in Standard Condition I and General Condition II, this condition establishes no additional specific operational or monitoring requirements for the emission points or emission units identified in Condition III.(E)(1).

(5) Recordkeeping and Reporting Requirements:

Except for applicable requirements prescribed in Standard Condition I and General Condition II, this condition establishes no additional specific recordkeeping or reporting requirements for the emission points or emission units identified in Condition III.(E)(1).

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(F) Specific Conditions for Insignificant Activities:

- (1) The following table contains a description of insignificant activities at the source at the time of permit issuance, in accordance with operating permit application OP18R1-030, received September 17, 2018, including any supporting information received prior to issuance of this permit:

Insignificant Activity ID	Unit Description	Insignificance Criteria
Unit 355-1	Arc Welder: Gas Metal Arc Welding in the Welding Department.	Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAPs that exceed the reporting level(s) in Title 129, Appendix II or Appendix III.
Unit 358-3	Paint Cure Oven: 0.7 MMBtu/hr natural gas burner on the powder paint cure oven, installed in 1961.	Stationary external combustion units not subject to a NSPS or NESHAP using natural gas and a heat input capacity rated below 10 MMBTU/hr each.
Unit 358-6	Lacquer Spray Painting: Touch-up Booth.	Total potential-to-emit HAPs from this source is 0.3 tpy. Actual emissions are 0.001 tpy. Source uses approximately 50 gal/yr.
Unit 363-1	Atmospheric Generators: Three (3) 0.36 MMBtu/hr natural gas exothermic atmosphere generators totaling 1.1 MMBtu/hr used to produce an oxygen-free environment within the electrically heated Brazer oven, installed in 1989.	Stationary external combustion units not subject to a NSPS or NESHAP using natural gas and a heat input capacity rated below 10 MMBTU/hr each.
Unit 369-1	Arc Welder: Gas Metal Arc Welding in the Jack Cell Department.	Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAPs that exceed the reporting level(s) in Title 129, Appendix II or Appendix III.
Unit 373-2	Space Heaters: Fifty two (52) natural gas fired space heaters, throughout the factory totaling, 7.665 MMBtu/hr heat input	Stationary external combustion units not subject to a NSPS or NESHAP using natural gas and a heat input capacity rated below 10 MMBTU/hr each.

Insignificant Activity ID	Unit Description	Insignificance Criteria
Unit 373-3	Rooftop Heating, Ventilation, and Air Conditioning (HVAC) Units: Seventeen (17) natural gas fired rooftop HVACs totaling 9.4 MMBtu/hr heat input	Stationary external combustion units not subject to a NSPS or NESHAP using natural gas and a heat input capacity rated below 10 MMBTU/hr each.
Unit 373-4	Propane Storage Tank: One (1) 500 gal propane storage tank used for forklift refueling – annual use 3000 gal/yr average of LPG (Propane)	Fuel storage and distribution equipment, including storage vessels (tanks), with aggregate annual throughput of less than 1 million gallons for the entire source.
Maintenance Activities	Maintenance of processing equipment, machinery, buildings, etc.	Maintenance activities are insignificant activities. The paint booth associated with maintenance activities cannot be used to paint metal parts produced at the facility for sale.

(2) Operational and Monitoring Requirements:

The insignificant activities identified in Condition III.(F)(1) are exempt from operational and monitoring requirements (Title 129, Chapter 7, Section 006.04 and Chapter 8, Section 004.01B).

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